

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

LITHIUMHUB, LLC and LITHIUMHUB
TECHNOLOGIES, LLC,

Plaintiffs,

v.

RELION BATTERY (SHENZHEN)
TECHNOLOGY CO.
4th Floor, Cui Hua Sa Industrial Part,
No. 144 Botanical Garden Road,
Shenzhen
China

Defendant.

CIVIL ACTION

NO. 5:24-cv-00135

**DECLARATION OF ABELINO REYNA IN SUPPORT OF MOTION TO STAY ALL
CLAIMS PENDING FINAL DISPOSITION OF RELATED PROCEEDING BEFORE
THE UNITED STATES INTERNATIONAL TRADE COMMISSION**

I, Abelino Reyna, declare as follows:

1. I am a partner at the law firm Patterson + Sheridan, L.L.P., counsel for Defendant Relion Battery (Shenzhen) Technology Co. (“Relion” or “Defendant”) in the above-captioned action (the “Action”). As a result, I am personally familiar with the facts set forth in this Declaration.

2. I make this declaration in support of Defendant’s Motion to Stay All Claims Pending Final Disposition of Related Proceeding Before the United States International Trade Commission.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the Notice of Institution of Investigation for Inv. No. 337-TA-1421, which is dated October 16, 2024.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the public version of the

original complaint filed with the United States International Trade Commission (ITC) by Plaintiff LithiumHub, LLC and Plaintiff LithiumHub Technologies, LLC (collectively, “Plaintiffs”) on September 12, 2024 in *In The Matter Of Certain Rechargeable Batteries and Components Thereof*, Inv. No. 337-TA-1421, which is dated September 12, 2024.

5. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 20, 2024

/s/ Abelino Reyna
Abelino Reyna